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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

NRG Energy Center San Francisco, LLC
14 Mint Plaza, Suite 200
San Francisco, CA. 94103-1835

February 9, 2016

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

Dear Sir/Madam,

Attached is the Title V Monitoring Report from the NRG Energy Center San Francisco, LLC. This report covers the period from August 1, 2015 to January 31, 2016. During this period, we have maintained continuous compliance with all requirements.

Sincerely,



Ted Vincent
Plant Manager
NRG Energy Center San Francisco
14 Mint Plaza, Suite 200, San Francisco, CA 94103
Office: 415.777.3415
Direct: 415.644.9784

February 9, 2016
Facility # B6151

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

Subject: Title V Semi-Annual Monitoring Report for the period August 1, 2015 to
January 31, 2016

The NRG Energy Center San Francisco herewith submits the Semi-Annual
Report for Facility B6151. This report includes detailed reports and compliance
reporting for the following sources for the Semi-Annual period August 1, 2015 to
January 31, 2016:

S-3: Boiler 3
Status: Full Compliance

S-4: Boiler 4
Status: Full Compliance

S-5: Boiler 5
Status: Full Compliance

S-6: Boiler 6
Status: Full Compliance

S-7: Boiler 7
Status: Full Compliance

S-9: Boiler 8
Status: Full Compliance

S10: UST Tank #3
Status: Full Compliance (exempt source)

S-11: UST Tank #4
Status: Full Compliance (exempt source)

S-12: UST Tank #5
Status: Full Compliance (exempt source)

S-13: Emergency Standby Diesel Engine
Status: Full Compliance

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in this report and the attached Compliance Certification Report form are true, accurate, and complete.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Vincent", with a stylized, cursive script.

Ted Vincent
Plant Manager
Facility #B6151

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

Table VII-A
S-3 BOILER NO. 3 & S-4 BOILER NO. 4

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|--------------------|-------------------|--------|---|----------------------------------|------------------------------|-----------------|-------------------|
| Oxides of Nitrogen | BAAQMD 9-7-301.1 | N | 30 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-301.2 | N | 40 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-307.5 | N | 9 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| | SIP 9-7-301.1 | Y | 30 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-305.1 | Y | 150 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-306.1 | Y | 150 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| Carbon Monoxide | BAAQMD 9-7-301.4 | N | 400 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-307.5 | N | 400 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| | SIP 9-7-301.2 | Y | 400 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-305.2 | Y | 400 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-306.2 | Y | 400 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| Opacity | BAAQMD 6-1-301 | N | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |
| Opacity | SIP 6-301 | Y | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|-----------------------|-------------------|--------|---|---------------------------------|------------------------------|-----------------|-------------------|
| FP | BAAQMD 6-1-310.3 | N | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| FP | SIP 6-310.3 | Y | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| SO2 | SIP 9-1-302 | Y | 300 ppm (dry) | | N | | Continuous |
| | SIP 9-1-304 | Y | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| SO2 | BAAQMD 9-1-302 | N | 300 ppm (dry) | | N | | Continuous |
| | BAAQMD 9-1-304 | N | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| Stack Gas Temperature | BAAQMD 9-7-312 | N | 150°F over saturated steam temperature | | N | | Continuous |

Table VII-A
S-5 BOILER NO. 5 & S-6 BOILER NO. 6

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|--------------------|-------------------|--------|---|----------------------------------|------------------------------|----------------------------|-------------------|
| Oxides of Nitrogen | BAAQMD 9-7-112.2 | N | 30 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | SIP 9-7-301.1 | Y | 30 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| | SIP 9-7-303 | Y | Weighted average of 9-7-301.1 and 9-7-302.1 | SIP 9-7-501 | C | Non-resettable fuel meters | Continuous |
| | SIP 9-7-305.1 | Y | 150 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| | SIP 9-7-306.1 | Y | 150 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| Carbon Monoxide | BAAQMD 9-7-112.2 | N | 400 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source test | Continuous |
| | BAAQMD 9-7-307.6 | N | 400 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| | SIP 9-7-301.2 | Y | 400 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| | SIP 9-7-305.2 | Y | 400 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| | SIP 9-7-306.2 | Y | 400 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| Opacity | BAAQMD 6-1-301 | N | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |
| | SIP 6-301 | Y | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |
| FP | BAAQMD 6-1-310.3 | N | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| FP | SIP 6-310.3 | Y | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| SO ₂ | SIP 9-1-302 | Y | 300 ppm (dry) | | N | | Continuous |

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|-----------------------|-------------------|--------|--|---------------------------------|------------------------------|-----------------|-------------------|
| | SIP 9-1-304 | Y | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| | BAAQMD 9-1-302 | N | 300 ppm (dry) | | N | | Continuous |
| Fuel Sulfur Content | BAAQMD 9-1-304 | N | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| Stack Gas Temperature | BAAQMD 9-7-312 | N | 150°F over saturated steam temperature | | N | | Continuous |

**Table VII-C
S-7 BOILER NO. 7**

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|--------------------|-------------------|--------|---|----------------------------------|------------------------------|----------------------------|-------------------|
| Oxides of Nitrogen | BAAQMD 9-7-301.1 | N | 30 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-301.2 | N | 40 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-307.4 | N | 15 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| | SIP 9-7-301.1 | Y | 30 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-303 | Y | Weighted average of 9-7-301.1 and 9-7-302.1 | SIP 9-7-501 | C | Non-resettable fuel meters | Continuous |
| Oxides of Nitrogen | SIP 9-7-305.1 | Y | 150 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-306.1 | Y | 150 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| Carbon Monoxide | BAAQMD 9-7-301.4 | N | 400 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-307.4 | N | 400 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| | SIP 9-7-301.2 | Y | 400 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-305.2 | Y | 400 ppmv, dry @ 3% O ₂ | | P/A | Source test | Continuous |
| | SIP 9-7-306.2 | Y | 400 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| Opacity | BAAQMD 6-1-301 | N | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |
| | SIP 6-301 | Y | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|-----------------------|-------------------|--------|--|---------------------------------|------------------------------|-----------------|-------------------|
| FP | BAAQMD 6-1-310.3 | N | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| | SIP 6-310.3 | Y | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| SO ₂ | SIP 9-1-302 | Y | 300 ppm (dry) | | N | | Continuous |
| | SIP 9-1-304 | Y | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| | BAAQMD 9-1-302 | N | 300 ppm (dry) | | N | | Continuous |
| Fuel Sulfur Content | BAAQMD 9-1-304 | N | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| Stack Gas Temperature | BAAQMD 9-7-312 | N | 150°F over saturated steam temperature | | N | | Continuous |

**Table VII-D
S-9 Boiler No. 8**

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|--------------------|---------------------------------|--------|---|----------------------------------|------------------------------|-----------------|-------------------|
| Oxides of Nitrogen | BAAQMD 9-7-301.1 | | 30 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-301.2 | | 40 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-307.6 | | 5 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| | SIP 9-7-301.1 | | 30 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| | BAAQMD Condition #21200, part 3 | | 9 ppmv, dry @ 3% O ₂ , averaged over 3 hours | BAAQMD Condition #21200, part 9 | P/A | Source Test | Continuous |
| Carbon Monoxide | BAAQMD 9-7-301.4 | | 400 ppmv, dry @ 3% O ₂ | BAAQMD Condition #21200, part 10 | P/A | Source Test | Continuous |
| | BAAQMD 9-7-307.6 | | 400 ppmv, dry @ 3% O ₂ | BAAQMD 9-7-403, 9-7-506 | P/A | Source Test | Continuous |
| Carbon Monoxide | SIP 9-7-301.2 | | 400 ppmv, dry @ 3% O ₂ | | N | | Continuous |
| | BAAQMD Condition #21200, part 4 | | 50 ppmv, dry @ 3% O ₂ , averaged over 3 hours | BAAQMD Condition #21200, part 9 | P/initial | Source Test | Continuous |
| Opacity | BAAQMD 6-1-301 | | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |
| | SIP 6-301 | | ≥ Ringelmann No. 1 for no more than 3 minutes in any one hour | | N | | Continuous |
| FP | BAAQMD 6-1-310.3 | | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |

| Type of limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|-----------------------|---------------------------------|------------|--|----------------------------------|------------------------------|-----------------|-------------------|
| | SIP 6-310.3 | | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| SO2 | BAAQMD 9-1-302 | | 300 ppm (dry) | | N | | Continuous |
| | BAAQMD 9-1-304 | | Sulfur content of fuel <0.5% by weight | | N | | Continuous |
| | SIP 9-1-302 | | 300 ppm (dry) | | N | | Continuous |
| Heat Input Rate | BAAQMD Condition #21200, part 1 | | 99.93 MMBTU/hr | BAAQMD Condition #21200, part 11 | P/M | Records | Continuous |
| Fuel usage | BAAQMD Condition #21200, part 5 | | 8,730,000 therms per rolling 12 months | BAAQMD Condition #21200, part 11 | P/M | Records | Continuous |
| Stack Gas Temperature | BAAQMD 9-7-312 | 1/1/1 3 | 150°F over saturated steam temperature | | N | | Continuous |

Table VII-E
Applicable Limits and Compliance Monitoring Requirements
S-13 STANDBY GENERATOR DIESEL ENGINE

| Type of Limit | Citation of Limit | FE Y/N | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance Status |
|--------------------|---------------------------------|--------|---|---------------------------------|------------------------------|--------------------|-------------------|
| Opacity | BAAQMD 6-1-303.1 | N | ≥ Ringelmann No. 2 for no more than 3 minutes in any hour | | N | | Continuous |
| | SIP 6-303.1 | Y | ≥ Ringelmann No. 2 for no more than 3 minutes in any hour | | N | | Continuous |
| FP | BAAQMD 6-1-310.3 | N | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| | SIP 6-310.3 | Y | 0.15 grain/dscf @ 6% O ₂ | | N | | Continuous |
| SO ₂ | BAAQMD 9-1-301 | N | GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours | | N | | Continuous |
| | BAAQMD 9-1-304 | N | Fuel sulfur content limit of 0.5% by weight | | N | | Continuous |
| | SIP 9-1-301 | Y | GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours | | N | | Continuous |
| | SIP 9-1-304 | Y | Fuel sulfur content limit of 0.5% by weight | | N | | Continuous |
| Hours of Operation | BAAQMD condition #22820, part 1 | | 20 hours per year discretionary operation | BAAQMD condition #22820, part 3 | C | Totalizing counter | Continuous |

Fuel Usage by Boiler

| Boiler / Source | Natural Gas (therms) | Diesel Oil (gal) | Comments |
|-----------------|-------------------------|---------------------|----------|
| Boiler 3 / S3 | 942,050 | 0 | |
| Boiler 4 / S4 | 226,747 | 0 | |
| Boiler 5 / S5 | 193,144 | 0 | |
| Boiler 6 / S6 | 155,649 | 0 | |
| Boiler 7 / S7 | 3,237,640 | 0 | |
| Boiler 8 / S9 | 722,349 | 0 | |
| Total | 5,477,579 | 0 | |

Note: Heat content Natural gas Fuel is 1013 BTU/scf based on PG&E records.
There was no oil operation during this reporting period.

Emergency Standby Generator Log (S-13)

| Date | Hour Meter Reading | | | Total Hours | 12 mo. Rolling (hrs) | Total Fuel Usage (gal) | Notes |
|---------|--------------------|--------|--------|-------------|----------------------|------------------------|--|
| | Time | Start | Stop | | | | |
| 8/12/15 | 12:45 | 0285.4 | 0294.4 | 9.0 | 15.6 | 28.8 | Maintenance, no load, fuel estimated based on 25% load (3.2 gph) |
| 8/20/15 | 14:00 | 0294.4 | 0295.6 | 1.2 | 14.9 | 3.8 | PG&E trip testing, no load, fuel estimated based on 25% load (3.2 gph) |
| 9/3/15 | 12:40 | 0295.6 | 0296.2 | 0.6 | 15.5 | 1.9 | Monthly test, no load, fuel estimated based on 25% load (3.2 gph) |
| 1/6/16 | 12:40 | 0296.2 | 296.3 | 0.1 | 15.3 | 0.3 | Monthly test, no load, fuel estimated based on 25% load (3.2 gph) |
| | | | | | | | End of record |
| | | | | | | | |
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Engineering Division
Bay Area Air Quality Management District
939 Ellis Street, San Francisco, CA 94109 • 749-4990

| |
|-------------------------|
| |
| Major Facility Review |
| Certification Statement |
| |

| | |
|---|--------------------------|
| FACILITY NAME: <u>NRG Energy Center San Francisco</u> | FACILITY #: <u>16151</u> |
|---|--------------------------|

STATEMENT OF COMPLIANCE:

I certify the following:

Read each statement carefully and initial each box for confirmation.

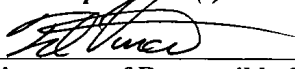
- ☒ *Based on information and belief formed after reasonable inquiry, the source(s) identified in the Applicable Requirements and Compliance Summary form that is(are) in compliance will continue to comply with the applicable requirement(s);*
- ☒ *Based on information and belief formed after reasonable inquiry, the source(s) identified in the Applicable Requirements and Compliance Summary form will comply with future-effective applicable requirement(s), on a timely basis;*
- ☒ *Based on information and belief formed after reasonable inquiry, information on application forms, all accompanying reports, and other required certifications is true, accurate, and complete;*
- ☒ *All fees required by Regulation 3, including Schedule P have been paid.*

STATEMENT OF NON-COMPLIANCE

Read statement carefully. Initial box for confirmation if statement is true.

I certify the following:

- ☐ *Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is(are) not in compliance with the applicable requirement(s) will comply in accordance with the attached compliance plan schedule.*



Signature of Responsible Official

Ted Vincent

Name of Responsible Official

February 9, 2016

Date